

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

CONTIGUITY LLC,

Plaintiff,

v.

HIKVISION USA, INC.,

Defendant.

Case No. 3:23-cv-00160

Patent Case

**STIPULATION TO AMEND COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiff Contiguity LLC and Defendant Hikvision USA, Inc., by and through their counsel, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed its initial Complaint (Doc. No. 1) in this action on January 20, 2023;

WHEREAS, the Parties have met and conferred regarding the adequacy of the initial Complaint;

WHEREAS, Plaintiff wishes to amend its initial Complaint in response to those conferences;

WHEREAS, Plaintiff does not waive its right to subsequent amendment under Rule 15(a)(1);

WHEREAS, Defendant agrees that it would be most efficient for Plaintiff to serve its amended complaint prior to Defendant's motion, answer, or other response to any complaint in this action;

WHEREAS, Defendant's stipulation is limited to the filing of an amended complaint only, and does not impact any rights, claims, or defenses that Defendant may have and otherwise has no substantive impact on Defendant's arguments or procedural posture in this case; and

THEREFORE, the Parties hereby stipulate under Rule 15(a)(2) that Plaintiff may amend its initial Complaint at this time, provided that the amendment does not impact Defendant's rights, claims, or defenses or Defendant's ability to respond by way of appropriate motion (*e.g.*, Rule 12 motion), and the amendment does not impact Plaintiff's right to later seek to further amend under Rule 15(a)(1). Rather than respond to the originally-filed Complaint, Defendant shall have 14 days to respond to the First Amended Complaint once it is filed in accordance with the proposed order. Further, the Defendant need only respond to the First Amended Complaint once it has been filed by Plaintiff, and the Parties stipulate to a further 14-day extension of time for Defendant's response to the initial Complaint in order to provide time for Plaintiff to file its First Amended Complaint.

Dated: June 16, 2023

/s/ William P. Ramey, III

William P. Ramey, III

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*ATTORNEY FOR PLAINTIFF  
CONTIGUITY LLC*

Respectfully submitted,

/s/ Keith B. Davis

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*ATTORNEY FOR DEFENDANT HIKVISION  
USA, INC.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed via CM/ECF on June 16, 2023 and was served upon all counsel of record who have appeared in the case via CM/ECF.

/s/ Keith B. Davis

Keith B. Davis